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(SPACE BELOW FOR FILING STAMP ONLY)

LAW OFFICES
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FIRST INTERSTATE BANK BUILDING
6255 SUNSET BOULEVARD, SUITE 2000
LOS ANGELES, CALIFORNIA 90028
(213) 464-8464

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Attorney for Plaintiff and Cross-
Defendant CHURCH OF
SCIENTOLOGY OF CALIFORNIA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, a California
Corporation,

Plaintiff,

vs.

GERALD ARMSTRONG, et al.,

Defendants.

Case No. C 420 153

INTERROGATORIES ACCOMPANYING
REQUEST FOR ADMISSIONS

[C.C.P. §2030]

AND RELATED CROSS-ACTION.

TO: ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

Plaintiff and cross-defendant CHURCH OF SCIENTOLOGY OF CALIFORNIA, a California corporation, hereby requests that defendant and cross-complainant, GERALD ARMSTRONG, answer under oath, pursuant to Code of Civil Procedure, Section 2030, within thirty (30) days, the following interrogatories.

These interrogatories call for information not merely within your personal knowledge, but any information obtainable by

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1 you, including information in the possession of anyone acting on
2 your behalf, such as your attorneys, investigators and their repre-
3 sentatives, agents, assistants or sources of information.

4 If you cannot answer an Interrogatory in full, after
5 exercising due diligence to secure the information to do so, so
6 state, and answer to the extent possible, stating your reason for
7 not being able to answer the remainder, and stating whatever in-
8 formation or knowledge you do have concerning the unanswered por-
9 tion.

10 Whenever you are asked to identify a document or writing,
11 it is requested that you sufficiently identify each such document
12 so that it may be the subject of a Request to Produce pursuant to
13 Code of Civil Procedure, Section 2031. As an alternative to such
14 identification, you may answer by voluntarily attaching a genuine
15 copy of the document or writing to your Answers to these Interroga-
16 tories.

17
18 DATED: April 19, 1983.

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21 LAW OFFICES OF
22 HOWARD J. STECHEL,
23 A Professional Corporation

24 By 
25 HOWARD J. STECHEL
26 Attorney for Plaintiff and Cross-
27 Defendant, CHURCH OF SCIENTOLOGY
28 OF CALIFORNIA

INTERROGATORIES

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3 If your response to any of plaintiff's Request for
4 Admissions (Set No.2) served herewith was anything except an
5 unqualified admission, please identify each such Request for Admis-
6 sion by number, and as to each such Request for Admission which
7 you did not unqualifiedly admit, please state the following
8 information:

9 a. The factual basis for your denial or other response
10 to each such Request for Admission.

11 b. Your contention of facts regarding the entire sub-
12 ject matter of each such Request for Admission.

13 c. The full name, business and residence address,
14 telephone number, job title or position, and employer, if any, of
15 each person known to you or to anyone acting on your behalf who is
16 or claims to be a witness to each of the facts referred to in
17 your answer to this interrogatory, or who claims to have any
18 knowledge of said facts.

19 d. As to each fact stated in response to this interroga-
20 tory, whether or not such fact is supported by any writing (as the
21 term "writing" is defined in Evidence Code §250) and, if so, as to
22 each such writing, a description of the writing, the name, address
23 and telephone number of the present custodian thereof, the date
24 of preparation of each such writing and the contents of each such
25 writing.

26 e. If in response to each such Request for Admission,
27 you disclaim sufficient knowledge so as to form an opinion or give
28 an answer, please state the following:

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1 (1) The reasons you or anyone acting on your behalf
2 have been unable to ascertain the facts sufficient and necessary
3 to enable you to admit or deny;

4 (2) The full name, business and residence address,
5 telephone number, job title or position, and employer, if any, of
6 each person whom you or anyone acting on your behalf inquired of
7 in order to gain sufficient knowledge so as to form an opinion
8 or give an answer;

9 (3) Whether or not you or anyone acting on your behalf
10 looked at any writing, (as the term "writing" is defined in
11 Evidence Code §250) in order to gain sufficient knowledge so as to
12 form an opinion with respect to, or give an answer to each such
13 Request for Admission, and, if so, as to each such writing, a
14 description of the writing, the name, address and telephone number
15 of the present custodian thereof, the date of preparation of each
16 such writing and the contents of each such writing;

17 (4) All efforts you or anyone acting on your behalf
18 have made to ascertain facts, knowledge or information to enable
19 you to admit or deny each such Request for Admission;

20 (5) The full name, business and residence address,
21 telephone number, job title and employer, if any, of each person
22 who made or assisted in making such efforts.

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VERIFICATION (CCP 446 / 2015.5)

I, the undersigned, say (applicable paragraph checked):

I am a party to this action. I have read the attached document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an officer a partner of _____ a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

I am (one of) the attorney(s) for _____ a party to this action. Such party is absent from the county aforesaid where such attorney(s) have their office, and I make this verification for and on behalf of that party for that reason. I have read the above document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, 19 _____, at _____, California.

Signature: _____

Re: Interrogatories Accompanying Request for Admissions

PROOF OF SERVICE BY MAIL (CCP 1013a / 2015.5)

I, the undersigned, am a resident of and/or employed in the county aforesaid; I am over the age of 18 and not a party to the within action; my business address is:

6255 Sunset Boulevard, Suite 2000, Los Angeles, CA. 90028

On the date indicated below (date of execution) I served the attached document on the parties to the within action, as identified below by their address or the address of their attorney of record, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Mail at the city indicated below in which this Proof of Service by Mail has been executed, said envelope(s) addressed as follows:

Contos & Bunch
5855 Topanga Canyon Boulevard
Suite 400
Woodland Hills, CA. 91367

Offices of Barry S. Litt
617 S, Olive Street
Suite 1000
Los Angeles, CA. 90014

I declare under penalty of perjury that the foregoing is true and correct.

(Federal) I declare that I am employed by the office of a member of the bar of this Court at whose direction the service was made.

Served and Executed on April 19, 19 83, at Los Angeles, California.

Signature: _____

HOWARD J. STECHEL

ACKNOWLEDGEMENT OF RECEIPT

Received a copy of the above-described document on _____ (date)

Signature: _____ FOR: _____

Name or person, firm or entity for whom receipt is acknowledged.